

Permit No.: V-1697
Issued : 07/10/2001
Expiration Date: 07/10/2007

IMPERIAL COUNTY AIR POLLUTION CONTROL DISTRICT

150 S. Ninth Street
El Centro, CA 92243
(760) 339 4606

TITLE V OPERATING PERMIT

Issued in Accordance with the Provisions of 40 CFR Part 70
and Rule 900 of the Imperial County Air Pollution Control District

Company Name:	Holly Sugar Corporation (dba) Spreckels Sugar Company
Facility Name:	Spreckels Sugar Company, Brawley Factory
SIC Code:	2063 (Beet Sugar)
Source Type:	Sugar Beet Processing Plant
Plant Location:	395 W. Keystone Road, Brawley, California
Mailing Address:	P.O. Box 581, Brawley, CA 92227
Responsible Official:	Bill Stewart
Plant Site Contact:	Bill Stewart

Telephone:	(760) 344 3112
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Issued by:

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Stephen L. Birdsall
Air Pollution Control Officer

Date

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Equipment Listing

I. Riley Boiler

Description: Spreader Stoker, Coal-Fired Steam Boiler.

Manufacturer, Model &
Serial Number: Riley Stoker, Model P76-36-WWW, Serial #NB1161.

Maximum Power Input/Output: 195 mm btu/hr.

Burner(s) Design, Operating
Temperature and Capacity Spreader-Stoker

Monitors: None

Control Equipment: (1) Venturi Type Wet Scrubber, Andersen 2000, Model WAV-18S, Serial #S2972-669.
(2) North Wet Scrubber, Joy Turbulair Size 10, Model BGD, Serial #J-720.
(3) South Wet Scrubber, Joy Turbulair Size 10, Model BGD, Serial #J-720.

II. CE Boiler

Description: Natural Gas-Fired Steam Boiler, Fuel Oil as Standby Fuel.

Manufacturer, Model &
Serial Number: Combustion Engineering, Model #30-A-15, Type A, Serial #NB110504.

Maximum Power Input/Output: 202 mm btu/hr.

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Burner(s) Design, Operating
Temperature: COEN GA OILDAZ30, 600 F.

Control Equipment: None

III. Union Boiler

Description: Natural Gas-Fired Steam Boiler, Fuel Oil as Standby Fuel.

Manufacturer, Model &
Serial Number: Union, Model MH7054, Serial #NB23380.

Maximum Power Input/Output: 144 mm btu/hr.

Burner(s) Design, Operating
Temperature: Union Gas/Oil; 550 F.

Control Equipment: None

IV. Auxiliary Boiler

Description: Natural Gas-Fired Steam Boiler, Stand-by.

Manufacturer, Model &
Serial Number: Combustion Engineering, Model 22-VP-12-WP; Serial #90673-2 NB110529.

Maximum Power Input/Output: 95 mm btu/hr.

Burner(s) Design, Operating
Temperature: COEN DAZ-30

Control Equipment: None

V. Lime Kiln

Description: Vertical Lime Kiln-Coke Fired.

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Manufacturer, Model &
Serial Number: Fuller 4.5 Mixed Feed Kiln; Serial #11-82-20333747.

Maximum Power Input/Output: N/A

Burner(s) Design, Operating
Temperature: N/A

Control Equipment: Scrubber

VI. Lime Kiln

Description: Vertical Coke-Fired Lime Kiln

Manufacturer, Model &
Serial Number: Belgium; Model and Serial # Not Available.

Control Equipment: Wet Scrubber

VII. Sulfur Stove

Description: Rotary Sulfur Burning Stove and Eduction System.

Manufacturer, Model &
Serial Number: Custom Made

Maximum Power Input/Output: 4000 lb/day Sulfur input.

Burner(s) Design, Operating
Temperature: None

Control Equipment: Eduction System (Closed)

VIII. Gasoline Storage Tank.

1. Gasoline Storage Tank, Aboveground, 6000 Gallons Capacity, 204 in. Length x 95 in. Diameter.

IX. Unconfined Portable Sandblaster.

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1. Unconfined Portable Sandblaster, 1.4 cu.ft. Pot; Pioneer MFG Blasting Gun, 1/4"; Air Compressor, 75 HP electrical motor.

Permit Conditions

I. General Permit Conditions

1. The permittee shall obtain an Authority to Construct permit prior to the modification or replacement of any equipment for which a Permit to Operate has been granted; and prior to the installation and operation of any equipment for which an Authority to Construct is required. **ICAPCD Rule 201, Permits Required, adopted prior to 10/15/79.**
2. No Air contaminant shall be released into the atmosphere which causes a public nuisance. **ICAPCD Rule 117, Nuisances, adopted prior to 02/21/72; ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80, ATC Permit 3048, Condition 5.**
3. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82. **40 CFR Part 82, Protection of Stratospheric Ozone.**
4. Compliance with Permit Conditions
 - a. The permittee shall comply with all permit conditions;
 - b. This permit does not convey property rights or exclusive privilege of any sort;
 - c. The noncompliance with any permit conditions is ground for permit termination, revocation and reissuance, modification, enforcement action, or denial of permit renewal;
 - d. The permittee shall not use the "need to hold or reduce a permitted activity in order to maintain compliance" as a defense for noncompliance with any permit conditions;

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- e. A pending permit action or notification of anticipated noncompliance does not stay any permit conditions;
 - f. Within a reasonable time period, the permittee shall furnish any information requested by the air pollution control officer (APCO) of ICAPCD, in writing, for the purpose of determining: 1) compliance with the permit, 2) whether or not cause exists to modify, revoke and reissue, or terminate a permit or for an enforcement action. **ICAPCD Rule 900.F.2.k, Procedures for Issuing Permit to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, Adopted 12/14/93; ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; ATC Permit 1697B, Condition A.1; ATC Permit 1631A, Conditions 1, 2, 3, and 4; ATC Permit 3048, Conditions 1, 2, 3, and 4; Permit to Operate 2687, Condition 1.**
5. Compliance with the terms and conditions of the Operating Permit is considered compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed. **ICAPCD Rule 900.D.2, Procedures for Issuing Permit to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, Adopted 12/14/93**

II. Emission Limits

A. Riley Boiler

1. The boiler shall not exceed the following stack emission limits:

Pollutant	Emission Rate
Total Suspended Particulates (TSP)	13 lb/hr
PM10	5 lbs/hr
Sulfur Oxides (SO _x)	20 lbs/hr or 0.103 lb/mm btu
Nitrogen Oxides (NO _x)	80 lbs/hr or 0.41 lb/mm btu

ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; ATC Permit 1697B, Condition D.1, and ICAPCD Rule 131, Fuel Burning Equipment, adopted prior to

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02/21/72.

2. The permittee shall not discharge into the atmosphere any combustion contaminants derived from the burning of any kind of material containing carbon in excess of 10 pounds per hour. **ICAPCD Rule 131, Fuel Burning Equipment, adopted prior to 02/21/72.**
3. The permittee shall not release or discharge into the atmosphere from any single source of emission, any air contaminant as dark or darker as designated as No. 1 on the Ringlemann Chart (20% opacity) for a period or periods aggregating more than three (3) minutes in any hour. **ICAPCD Rule 401.A.1, Opacity of Emissions, adopted 11/19/85.**
4. The dust collectors serving the coal and ash handling systems shall not emit more than 0.01 grains per standard cubic foot of air and 10% opacity. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; ATC Permit 1697B, Condition C.2.**
5. The permittee shall not release or discharge air contaminants into the atmosphere from any single processing unit source or other contrivance, in excess of 0.2 grains per cubic foot of gas at standard conditions. **ICAPCD Rule 403.A, Quantity of emissions, adopted 11/19/85.**
6. The permittee shall not release into the atmosphere from any single source of emission, sulfur compounds, calculated as sulphur dioxide (SO₂) in excess of 0.2 percent by volume, measured at the point of discharge. **ICAPCD Rule 405, Sulfur Compounds, adopted 11/19/85.**
7. The permittee shall not discharge into the atmosphere from any single source of emissions any combustion contaminants exceeding in concentration at the point of discharge of 0.2 grains per cubic foot of gas calculated to 12% CO₂ at standard conditions, except during the start of an operation; or charge in an energy source, during the time necessary to bring the combustion process up to operating level. **ICAPCD Rule 406, Specific Contaminants, adopted 10/15/79.**

B. CE Boiler

1. The boiler shall not exceed the following stack emission limits:

Pollutant	Emission Rate
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PM10	10 lbs/hr
Sulfur Dioxide (SO ₂)	200 lbs/hr
Nitrogen Oxides (NO _x)	140 lbs/hr

ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; Permit to Operate 1112.

2. The permittee shall not release or discharge into the atmosphere from any single source of emission, any air contaminant as dark or darker as designated as No. 2 on the Ringlemann Chart (40% opacity) for a period or periods aggregating more than three (3) minutes in any hour. **ICAPCD Rule 401.A.3, Opacity of Emissions, adopted 11/19/85 and ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; Permit to Operate 1112.**
3. The permittee shall not release or discharge air contaminants into the atmosphere from any single processing unit source or other contrivance, in excess of 0.3 grains per cubic foot of gas at standard conditions. **ICAPCD Rule 403.A, Quantity of emissions, adopted 11/19/85.**
4. The permittee shall not release into the atmosphere from any single source of emission, sulfur compounds, calculated as sulphur dioxide (SO₂) in excess of 0.2 percent by volume, measured at the point of discharge. **ICAPCD Rule 405, Sulfur Compounds, adopted prior to 11/04/77.**
5. The permittee shall not burn any gaseous fuel containing sulfur compounds in excess of 50 grains per 100 cubic feet of gaseous fuel, calculated as hydrogen sulfide at standard conditions or any liquid fuel having a sulfur content in excess of 0.5 percent by weight. **ICAPCD Rule 126, Sulfur Contents of Fuels, adopted prior to 06/30/72.**

C. Union Boiler

1. The boiler shall not exceed the following stack emission limits:

Pollutant	Emission Rate
PM10	10 lbs/hr

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Sulfur Dioxide (SO ₂)	200 lbs/hr
Nitrogen Oxides (NO _x)	140 lbs/hr

ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; Permit to Operate 1113.

2. The permittee shall not release or discharge into the atmosphere from any single source of emission, any air contaminant as dark or darker as designated as No. 2 on the Ringlemann Chart (40% opacity) for a period or periods aggregating more than three (3) minutes in any hour. **ICAPCD Rule 401.A.3, Opacity of Emissions, adopted 11/19/85 and ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; Permit to Operate 1113.**
3. The permittee shall not release or discharge air contaminants into the atmosphere from any single processing unit source or other contrivance, in excess of 0.3 grains per cubic foot of gas at standard conditions. **ICAPCD Rule 403.A, Quantity of emissions, adopted 11/19/85.**
4. The permittee shall not release into the atmosphere from any single source of emission, sulfur compounds, calculated as sulphur dioxide (SO₂) in excess of 0.2 percent by volume, measured at the point of discharge. **ICAPCD Rule 405, Sulfur Compounds, adopted prior to 11/04/77.**
5. The permittee shall not burn any gaseous fuel containing sulfur compounds in excess of 50 grains per 100 cubic feet of gaseous fuel, calculated as hydrogen sulfide at standard conditions or any liquid fuel having a sulfur content in excess of 0.5 percent by weight. **ICAPCD Rule 126, Sulfur Contents of Fuels, adopted prior to 06/30/72.**

D. Auxiliary Boiler

1. The boiler shall not exceed the following stack emission limits:

Pollutant	Emission Rate
PM10	1 lbs/hr
Nitrogen Oxides (NO _x)	13 lbs/hr

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ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; Permit to Operate 2274.

2. The permittee shall not release or discharge into the atmosphere from any single source of emission, any air contaminant as dark or darker as designated as No. 1 on the Ringelmann Chart (20% opacity) for a period or periods aggregating more than three (3) minutes in any hour. **ICAPCD Rule 401.A.1, Opacity of Emissions, adopted 11/19/85 and ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; Permit to Operate 2274.**
3. The permittee shall not release or discharge air contaminants into the atmosphere from any single processing unit source or other contrivance, in excess of 0.2 grains per cubic foot of gas at standard conditions. **ICAPCD Rule 403.A, Quantity of emissions, adopted 11/19/85.**
4. The permittee shall not release into the atmosphere from any single source of emission, sulfur compounds, calculated as sulphur dioxide (SO₂) in excess of 0.2 percent by volume, measured at the point of discharge. **ICAPCD Rule 405, Sulfur Compounds, adopted prior to 11/04/77.**
5. The permittee shall not burn any gaseous fuel containing sulfur compounds in excess of 50 grains per 100 cubic feet of gaseous fuel, calculated as hydrogen sulfide at standard conditions or any liquid fuel having a sulfur content in excess of 0.5 percent by weight. **ICAPCD Rule 126, Sulfur Contents of Fuels, adopted prior to 06/30/72.**

E. Lime Kilns

1. The permittee shall not exceed the following emission rates from the Fuller-Beckenbach lime kiln exhaust:

Pollutant	Emission Rate
Total Suspended Particulates (TSP)	250 lb/day and 16.1 lb/hr
Sulfur Dioxide	250 lb/day
Nitrogen Oxides	250 lb/day

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ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; Permit to Operate 1631A, Condition A.1.

2. Visible emissions from the lime kilns exhaust shall not exceed 20% opacity for more than three (3) minutes in any one hour. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; Permit to Operate 1631A, Condition A.2.**
3. Visible emissions from the coke and limestone storage piles shall not exceed 20% opacity for more than three (3) minutes in any one hour. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; Permit to Operate 1631A, Condition A.3.**
4. Visible emissions from the baghouse stack shall not exceed 20% opacity for more than three (3) minutes in any one hour. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; Permit to Operate 1631A, Condition B.4.**

F. Sulfur Stove

1. The unit shall not exceed the following stack emission limits:

Pollutant	Emission Rate
PM10	12 lbs/hr
Sulfur Dioxide (SO ₂)	0.2 percent by volume

ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; Permit to Operate 2273A, Condition A.2.

G. Sugar Packing and Warehouse Dust Collectors

1. Visible emissions from the dust collector's exhaust shall not exceed 20% opacity for more than three (3) minutes in any one hour. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; Permit to Operate 2273A, Condition B.3.**

H. Sugar Storage Silos Dust Collectors.

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1. Visible emissions from the dust collector's exhaust shall not exceed 20% opacity for more than three (3) minutes in any one hour. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; Permit to Operate 2273A, Condition C.3.**

I. Gypsum Bulk Silo.

1. Visible emissions from the vent sack filter shall not exceed 20% opacity for more than three (3) minutes in any one hour. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; Permit to Operate 2273A, Condition D.3.**

J. Gasoline Storage Tank.

1. The permittee shall not transfer or permit the transfer of gasoline from any tank truck or trailer into any stationary gasoline storage tank with a capacity of more than 250 gallons unless 90 percent by weight of the gasoline vapors displaced during the filling of the tank are prevented from being release to the atmosphere. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; Permit to Operate 2687.**

K. Unconfined Portable Sandblaster.

1. Visible emissions from the unconfined portable sandblaster shall not exceed 40%, for a period or periods aggregating more than three minutes in any one hour. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; ATC Permit 3048, Condition 6.**

III. Operational Limits

A. Riley Boiler

1. The boiler shall be restricted to operate under the following maximum operating parameters:

Parameter	Maximum Operating Level
BTU Input	194.4 E6 Btu/hr
Coal Burning Rate	18,514 lb/hr

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Yearly Usage	135 days/yr
Average Coal Content (as received basis)	0.8% Sulfur; 1.4% Nitrogen

ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; ATC Permit 1697B, Condition B.

2. The permittee shall control fugitive coal dust emission from the railroad unloading hopper and coal storage piles with a chemical surfactant or any other method to adequately control fugitive coal dust airborne emissions as may be required by the District. Appropriate methods shall be employed to control fugitive dust emissions from ash disposal areas. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; ATC Permit 1697B, Condition C.1.**
3. The permittee shall not burn the collected coal dust fines (less than 0.1inch) in excess of 200 lbs/day. The collected coal dust fines are fines collected from cyclone for the coal conveying and handling system. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; ATC Permit 1697B, Condition C.3.**
4. The boiler shall be operated with minimum oxygen, the level of which shall be determined by the District following the most recent source test. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; ATC Permit 1697B, Condition D.2.**
5. The permittee shall install and provide a continuous instack monitoring system, as the Air Pollution Control Officer may require, if a source test result shows a NO_x emission rate greater than 90% of the emission rate allowable for the Riley boiler. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; ATC Permit 1697B, Condition E.2.**
6. The permittee shall provide a pressure drop meter across the venturi throat. The pressure drop shall be maintained continuously at the level determined by the District following the most recent source test. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; ATC Permit 1697B, Condition E.3.**
7. The permittee shall provide a circulation liquid and pH meter. The circulation rate and pH shall be maintained thereafter at the rate/levels, as determined by the District following the most recent source test. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; ATC Permit 1697B, Condition E.4.**

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8. The permittee shall provide stack access and necessary facilities for source testing. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; ATC Permit 1697B, Condition E.**
9. The permittee shall provide a continuous flue gas oxygen monitoring system and chart recorder. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; ATC Permit 1697B, Condition E.6.**
- B. Auxiliary Boiler
 1. The auxiliary boiler shall be allowed to operate only when one of the three boilers (Riley Boiler, CE Boiler, or Union Boiler) is not in operation. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; Permit to Operate 2274.**
- C. Lime Kilns.
 1. The dust collection system shall be equipped with a baghouse. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; Permit to Operate 1631A, Condition B.1.**
 2. All emission control equipment shall be maintained in proper working order at all times. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; Permit to Operate 1631A, Condition B.2.**
 3. The dust collected by the baghouse filter must be discharged into a closed system. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; Permit to Operate 1631A, Condition B.5.**
- D. Sugar Packing and Warehouse Dust Collectors
 1. The dust collector shall contain a pressure drop meter in good working order. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; Permit to Operate 2273A.**
- E. Sugar Storage Silos Dust Collectors.
 1. The dust collector shall contain a pressure drop meter in good working order. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; Permit to Operate 2273A.**

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F. Gypsum Bulk Silo

1. The gypsum silo shall be equipped with a vent sack filter. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; Permit to Operate 2273A.**
2. The dust collected by the sack filter shall be discharged into closed containers only. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; Permit to Operate 2273A.**

G. Gasoline Storage Tank.

1. The permittee shall not transfer or permit the transfer of gasoline from any tank truck or trailer into any stationary gasoline storage tank with a capacity of more than 250 gallons unless the container is equipped with a permanent submerged fill pipe. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; Permit to Operate 2687.**

H. Unconfined Sandblaster

1. The permittee shall use only the certified abrasives listed on Air Resources Board's Executive Order for dry outdoor blasting. The current list shall be updated every year. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; ATC Permit 3048, Condition 7.**

IV. Monitoring, Testing, and Analysis

1. The permittee shall conduct a performance test to the Riley boiler for TSP, SO₂, SO_x and NO_x, at least once each calendar year. The performance test shall be conducted while the boiler is operating at full capacity, as defined on 40 CFR Part 60.41(b). The permittee shall submit approved source test protocol at least 30 days before commencing stack testing. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; ATC Permit 1697B, Condition E.1, and ICAPCD Rule 900.F.2.e, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, adopted 12/14/93.**
2. The permittee shall conduct the source test for the Riley boiler in accordance with CARB Method 100 for NO_x, CARB Method 100 for SO₂, USEPA Method 8 for SO_x and USEPA

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Method 5B for total suspended particulate or any other USEPA Method approved by the District. The compliance source test shall include, but not be limited to, the determination of the following parameters:

- a. Nitrogen Oxides: lb/mm btu and lb/hr.
- b. TSP: gr/DSCF, gr/DSCF @ 12% CO₂ and lb/hr.
- c. SO₂: ppmv.
- d. SO_x: lb/hr, lb/mmbtu

and the following process parameters:

- e. Average coal burning rate during the test and average heat input (mmbtu/hr).
 - f. Average lb-steam/hr produced during the test.
 - g. Analysis of sulfur, nitrogen, and Btu of the coal. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; ATC Permit 1697B, Condition E.1, and ICAPCD Rule 900.F.2.e, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, adopted 12/14/93.**
- 3. The permittee shall provide an additional source test to the Riley boiler as may be required by the APCD, if the average coal content for any month exceeds 0.82% for sulfur or 1.4% for nitrogen. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; ATC Permit 1697B, Condition E.8.**
 - 4. The permittee shall determine compliance with the opacity limit for the Riley boiler using U.S. EPA Method 22. Additionally, the permittee shall use U.S. EPA Method 22 for the CE and Union boilers when burning No. 6 fuel oil. Daily inspections shall be conducted while the equipment is operating and during daylight hours. If any visible emissions, excluding condensed water vapor, are detected during an inspection and the emissions are observed continuously or intermittently for 3 minutes in any hour, the permittee shall:
 - a. Take corrective actions that eliminate the visible emissions and report the visible emission as a potential exceedance.

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- b. If all visible emissions are not eliminated through corrective actions within 24 hours, the permittee shall have a CARB-certified smoke-reader determine compliance with the opacity standard, using EPA Method 9. Inspection shall be conducted for 3 minutes within 3 days of problem detection. The certified smoke-reader shall continue to use Method 9 on a daily basis until the daily readings show compliance with the applicable limit. **ICAPCD Rule 900.F.2.e, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, adopted 12/14/93.**
5. The permittee shall conduct a performance test to the CE, Union and Auxiliary boilers for NO_x. First source test shall be conducted during 2002 and every five years thereafter. The performance test shall be conducted while the boilers are operating at full capacity. The permittee shall submit approved source test protocol at least 30 days before commencing stack testing. **ICAPCD Rule 900.F.2.e, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, adopted 12/14/93.**
6. The permittee shall conduct a source test for the CE, Union and Auxiliary boilers in accordance with EPA Method 7E for NO_x or any other USEPA Method approved by the District. The compliance source test shall include, but not be limited to, the determination of the following parameters:
 - a. Nitrogen Oxides: ppm at 3% O₂, dry and lb/hr.and the following process parameters:
 - b. Average lb-steam/hr produced during the test. **ICAPCD Rule 900.F.2.e, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, adopted 12/14/93.**
7. The permittee shall determine compliance with the opacity limit for the dust collectors serving the coal and ash handling system, lime kilns dust collection system, sugar packing area and sugar storage silos using U.S. EPA Method 22. Quarterly inspections shall be conducted while the equipment is operating and during daylight hours. If any visible emissions, excluding condensed water vapor, are detected during an inspection and the emissions are observed continuously or intermittently for 3 minutes in any hour, the permittee shall:

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- a. Take corrective actions that eliminate the visible emissions and report the visible emission as a potential exceedance.
 - b. If all visible emissions are not eliminated through corrective actions within 24 hours, the permittee shall have a CARB-certified smoke-reader determine compliance with the opacity standard, using EPA Method 9. Inspection shall be conducted for 3 minutes within 3 days of problem detection. The certified smoke-reader shall continue to use Method 9 on a daily basis until the daily readings show compliance with the applicable limit. **ICAPCD Rule 900.F.2.e, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, adopted 12/14/93.**
8. The permittee shall inspect filter bags at the dust collectors serving the lime kilns dust collection system, sugar packing area and sugar storage silos for scuffs, wear, holes, tears, etc and all connection points, hatches, etc. on an annual basis. **ICAPCD Rule 900.F.2.e, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, adopted 12/14/93.**

V. Record keeping Requirements

1. The permittee shall maintain weekly records for the Riley boiler's venturi scrubber of pressure drop and scrubbing liquid flow rate. **ICAPCD Rule 900.F.2.e, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, adopted 12/14/93.**
2. Records of all monitoring and support information shall include the following: 1) date, place, and time of measurement or maintenance activity; 2) operating conditions at the time of measurement or maintenance activity; 3) date, place, name or company or entity that performed the measurement or maintenance activity and the methods used; and 4) results of the measurement or maintenance. **ICAPCD Rule 900.F.2.f, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, adopted 12/14/93.**
3. Records of all required monitoring data and support information shall be retained for at least five years from date of initial entry. **ICAPCD Rule 900.F.2.f, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal C A A Amendments of 1990, adopted 12/14/93.**

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4. The permittee shall maintain records of all visible emission observations conducted. The Smoke Emission Inspection form for outdoor location from EPA Method 22 shall be used to record all inspections. Additionally, the following records shall be required:
 - a. For each emission point where corrective action is required: i) nature of visible emissions, ii) description of corrective actions taken to abate visible emissions, and iii) date and time visible emission was abated.
 - b. When EPA Method 9 is required: i) all visible emission observations conducted by a certified smoke reader, and ii) name of the person conducting the inspection and measurement, or monitoring. **ICAPCD Rule 900.F.2.e, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, adopted 12/14/93.**

VI. Reporting Requirements

1. The permittee shall submit a written annual report of the coal fuel with the information concerning the facility operation during the immediate preceding calendar year. The report shall be submitted to the District by the end of February of each operating year. The report shall contain the following information:
 - a. Fuel usage; and
 - b. Analysis of sulfur, nitrogen, and Btu of the coal. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; ATC Permit 1697B, Condition E.7.**
2. The permittee shall furnish the District written results of the source tests conducted within forty-five (45) days of the test completion. **ICAPCD Rule 900.F.2.g, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, adopted 12/14/93.**
3. The permittee shall report any deviation from requirements in this Permit to Operate, other than deviations reported to the District pursuant to the District Upset/ Breakdown rule, to the APCO within 2 days of occurrence. The permittee shall use District approved forms to report any deviations. **ICAPCD Rule 900.F.2.g, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, adopted 12/14/93.**

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4. The permittee shall submit to the ICAPCD an annual report for the unconfined portable sandblaster which includes the total pounds and brand name of abrasives used during the year. The report shall reach the ICAPCD by the end of February following the preceding operating year. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; ATC Permit 3048, Condition 8.**
5. The permittee shall submit a written report to the APCO within ten days after a breakdown occurrence has been corrected. This report shall include: a) a statement that the occurrence has been corrected, together with the date of correction and proof of compliance; b) the reason(s) or cause(s) of the occurrence; c) a description of the corrective measures undertaken; and d) the type of emission and estimated quantity of the emissions caused by the occurrence. **ICAPCD Rule 111.D, Equipment Breakdown, adopted 12/11/79.**
6. The permittee shall submit a written monitoring report to the APCD every six months. The report shall identify any deviations from permit requirements, including those previously reported to the APCO. These reports shall be submitted within 30 days of the end of each reporting period. All reports of a deviation from permit requirements shall include the probable cause of the deviation and any preventive or corrective action taken. The permittee shall use District's approved forms for the report regarding deviation from permit requirements and shall also include a written statement from the responsible official which certifies the truth, accuracy, and completeness of the report. When no deviations have occurred for the semester, such information shall be stated in the report. **ICAPCD Rule 900.F.2.g, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, adopted 12/14/93.**

VII. Emergency Provisions

1. The permittee shall notify the ICAPCD of any upset conditions, breakdown or scheduled maintenance which cause a violation of emission limitations prescribed by District Rules and Regulations, or by State law. The District shall be notified as soon as reasonably possible but not later than two (2) hours after its detection. The completion of corrective measures or the shut down of emitting equipment is required within 24 hours of occurrence of a breakdown condition. **ICAPCD Rule 111.C, Equipment Breakdown, adopted 12/11/79, ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; ATC Permit 538A, Condition 2; ATC Permit 1631A, Condition B.2.**
2. If the breakdown condition will either require more than 24-hours to correct or persist

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longer than the end of the production run (except for continuous monitoring equipment, for which the period shall be ninety-six (96) hours), the owner or operator may, in lieu of shutdown, request the Air Pollution Control Officer to commence the emergency variance procedure. **ICAPCD Rule 517, Emergency Variance, adopted 12/11/79; New Source Review, adopted prior to 03/17/80; ATC Permit 1631A, Condition B.3 {State and District only}.**

3. Within two weeks of an emergency event, the operator shall submit to the District a properly signed, contemporaneous log or other relevant evidence which demonstrates that: a) an emergency occurred; b) the permittee can identify the cause(s) of the emergency; c) the facility was being properly operated at the time of the emergency; d) all steps were taken to minimize the emissions resulting from the emergency; and e) within two working days of the emergency event, the permittee provided the District with a description of the emergency and any mitigation or corrective actions taken. **ICAPCD Rule 900.F.2.I, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, adopted 12/14/93.**
4. In any enforcement proceeding, the permittee has the burden of proof for establishing that an emergency occurred. **ICAPCD Rule 900.F.2.I, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, adopted 12/14/93.**

VIII. Compliance

1. Compliance Certification

The permittee shall submit compliance certification reports to the U.S.EPA, Director, Air Division, 75 Hawthorne Street, AIR-3, San Francisco, CA 94105 and the APCO every 12 months. These reports shall be submitted by the end of February following the preceding operating year. The reports shall include the following requirements: a) identify the basis for each permit term or condition and a means of monitoring compliance with the term or condition; b) the compliance status and method(s) used to determine compliance for the current time period and over the entire reporting period; and c) any additional inspection, monitoring, or entry requirement that may be promulgated pursuant to sections 114(a) and 504(b) of the CAA. The permittee shall use District's approved forms for the compliance certification and shall also include a written statement from the responsible official which certifies the truth, accuracy, and completeness of the report. **ICAPCD Rule 900.F.2.n, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the**

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IX. Right of Entry

1. The Regional Administrator of United States Environmental Protection Agency (U.S. EPA), the Executive Officer of the California Air Resources Board, the APCO, or their authorized representatives, upon the presentation of credentials, shall be permitted to enter upon the premises:
 - a. To inspect the stationary source, including equipment, work practices, operations, and emissions-related activity; and
 - b. To inspect and duplicate records required by this Permit to Operate; and
 - c. To sample substances or monitor emissions from the source or other parameters to assure compliance with the permit or applicable requirements. Monitoring of emissions can include source testing. **ICAPCD Rule 900.F.2.j, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, adopted 12/14/93.**

X. Severability

1. The provisions of this Permit to Operate are severable and if any provisions of this Permit to Operate are held invalid, the remainder of this Permit to Operate shall not be affected thereby. **ICAPCD Rule 900.F.2.m, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, adopted 12/14/93.**

XI. Permit Life

1. This Permit to Operate shall become invalid five years from the date of issuance unless a timely and complete renewal application is submitted to the district. The permittee shall apply for renewal of this permit no earlier than 18 months and no later than 6 months before the expiration date of the current permit to operate. Upon submittal of a timely and complete renewal application, this permit to operate shall remain in effect until the APCO issues or deny the renewal application. **ICAPCD Rule 900.F.2.o, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, adopted 12/14/93.**

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XII. Payment of Fees

1. The permittee shall remit the Title V annual fee to the District in a timely basis. Failure to remit fees on a timely basis shall result in forfeiture of this Permit to Operate. Operation without a Permit to Operate subjects the source to potential enforcement action by the District and the U.S. EPA pursuant to section 502(a) of the Clean Air Act. **ICAPCD Rule 900.F.2.p, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, adopted 12/14/93.**